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 Sharp Electronics Manufacturing Company of America, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHARP ELECTRONICS CORPORATION;
 SHARP ELECTRONICS MANUFACTURING
 COMPANY OF AMERICA, INC.,

Plaintiffs,

v.

HITACHI, LTD.; HITACHI DISPLAYS, LTD.;
 HITACHI AMERICA, LTD.; HITACHI ASIA,
 LTD.; HITACHI ELECTRONIC DEVICES (USA),
 INC.; SHENZHEN SEG HITACHI COLOR
 DISPLAY DEVICES, LTD.; LG ELECTRONICS,
 INC.; LG ELECTRONICS USA, INC.; LP
 DISPLAYS INTERNATIONAL, LTD.;
 LG.PHILIPS DISPLAYS HOLDING B.V.;
 LG.PHILIPS DISPLAYS INTERNATIONAL B.V.;
 MERIDIAN SOLAR & DISPLAY CO., LTD.;
 PANASONIC CORPORATION; PANASONIC
 CORPORATION OF NORTH AMERICA;
 PANASONIC CONSUMER ELECTRONICS CO.;
 MT PICTURE DISPLAY CO., LTD.;
 MATSUSHITA ELECTRONIC CORPORATION

Case No. 13-cv-01173-SC

Case No. 07-cv-05944-SC

MDL No. 1917

**DECLARATION OF CRAIG A.
 BENSON IN SUPPORT OF
 PLAINTIFFS' ADMINISTRATIVE
 MOTION TO SEAL PORTIONS OF
 ITS FIRST AMENDED
 COMPLAINT**

CIVIL L.R. 79-5

(MALAYSIA) SDN BHD.; BEIJING
MATSUSHITA COLOR CRT CO., LTD.; PT.MT
PICTURE DISPLAY INDONESIA; SAMSUNG
SDI CO., LTD.; SAMSUNG SDI AMERICA, INC.;
SAMSUNG SDI (MALAYSIA) SDN BHD.;
SAMSUNG SDI MEXICO S.A. DE C.V.;
SAMSUNG SDI BRASIL LTDA.; SHENZHEN
SAMSUNG SDI CO., LTD.; TIANJIN SAMSUNG
SDI CO., LTD.; SAMSUNG SDI (HONG KONG),
LTD.; TOSHIBA CORPORATION; TOSHIBA
AMERICA, INC.; TOSHIBA AMERICA
CONSUMER PRODUCTS LLC; TOSHIBA
AMERICA ELECTRONIC COMPONENTS, INC.;
TOSHIBA AMERICA INFORMATION
SYSTEMS, INC.; TOSHIBA DISPLAY DEVICES
(THAILAND) COMPANY, LTD.; THOMSON SA
(N/K/A TECHNICOLOR SA); THOMSON
CONSUMER ELECTRONICS, INC. (N/K/A
TECHNICOLOR USA, INC.); VIDEOCON
INDUSTRIES, LTD.; TECHNOLOGIES
DISPLAYS AMERICAS LLC,

Defendants.

1 I, Craig A. Benson, hereby declare as follows:

2 1. I am an active member in good standing of the bars of the State of Maryland, the
3 State of New York, and the District of Columbia and on March 20, 2013 was granted leave to
4 appear *pro hac vice*. (Dkt. No. 12.) I am associated with the firm of Paul, Weiss, Rifkind,
5 Wharton & Garrison LLP, counsel to Plaintiffs Sharp Electronics Corporation and Sharp
6 Electronics Manufacturing Company of America, Inc. (collectively, "Sharp"). I submit this
7 Declaration in support of Sharp's Administrative Motion to Seal Portions of Plaintiffs' First
8 Amended Complaint ("Motion"). I have personal knowledge of the facts stated herein and could
9 competently testify to these facts if called as a witness.

10 2. Portions of Sharp's First Amended Complaint contain discussion, analysis,
11 references to, or information taken directly from, material designated by a Defendant or
12 Defendants in this matter as "Confidential" or "Highly Confidential." pursuant to the Protective
13 Order applicable in this action. Specifically, portions of paragraphs 196-199, 239, 240, and 259
14 of Sharp's FAC contain such confidential material.

15 3. Sharp seeks to submit the above material under seal in good faith in order to
16 comply with the Protective Order in this action and the applicable Local Rules. Because the
17 information Sharp seeks to submit under seal has been designated as Confidential or Highly
18 Confidential by another party, Sharp is filing the accompanying Motion, and will be prepared to
19 file an unredacted First Amended Complaint in the public record if required by Civil Local Rule
20 79-5(e).

21 I declare under penalty of perjury, under the laws of the United States of America, that
22 the foregoing is true and correct.

23 Executed this 28th day of October, 2013 in Washington, DC.

24 /s/ Craig A. Benson

25 Craig A. Benson